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ELI LILLY INDUSTRIES, INC.
NEW YORK, N.Y.

CALL BOX 1198 - PUEBLO STATION
CAROLINA, PUERTO RICO 00628-1198

90 JAN 17 PM 1:21

KM. 146.7 STATE ROAD NO. 2
MAYAGUEZ, PUERTO RICO

P.O. BOX 1748
MAYAGUEZ, PUERTO RICO 00709

PERMIT ADMINISTRATION
BRANCH

December 18, 1989

CERTIFIED/RRR (P425689167)

Regional Administrator
U.S. Environmental Protection Agency
Region II, 26 Federal Plaza
New York, New York 10278

RE: RCRA PERMIT NO. PRD 091024786

Gentlemen:

As it is established under Module VI, Section F-1 of the reference matter, the Permittee (Eli Lilly Industries, Inc.) shall provide within 30 calendar of the permit effective date (December 1, 1989) the information requested in Part 1 and 2 of the worksheet #1 in Attachment K of the permit.

Attached to this letter is the requested information contained in worksheet #1, part 1 and 2.

The rest of the information of Section F will be submitted to you before March 1, 1990 as it is established in the permit.

Very truly yours,



Gabriel Garcia
Supervisor
Engineering Department

rb

Enclosure

WORKSHEET 1

Data Requirements

(if facility has more than five units, attach additional sheets)

I. REFERENCE INFORMATION

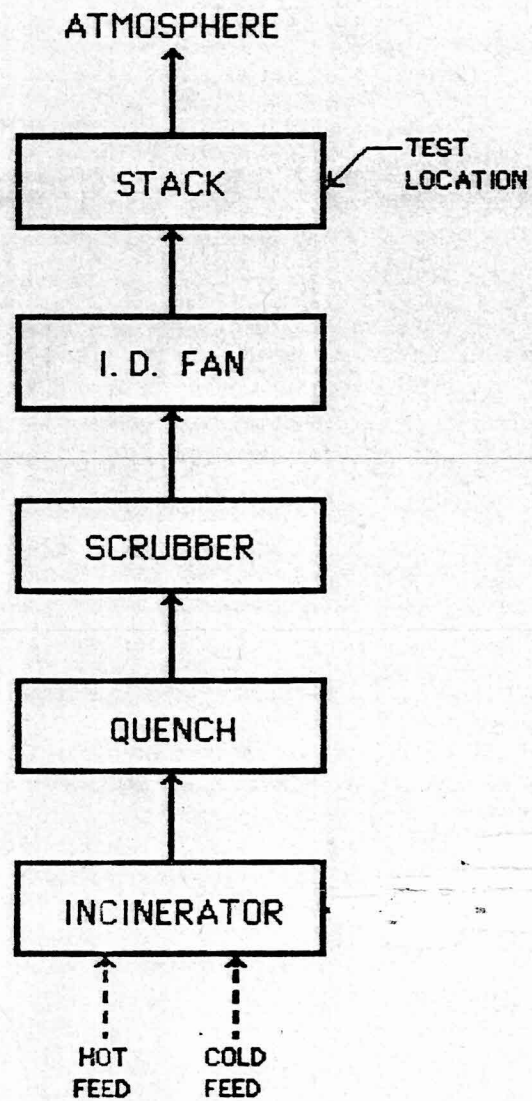
A. Facility Name ELI LILLY INDUSTRIES, INC.
 B. Address STATE ROAD No. 2, MAYAGUEZ, P.R. 00708
 C. Phone Number (809) 834-7846
 D. Date of Submission 12/15/89

II. SITE INFORMATION

Inclinator Stacks

A. Stack Parameters	1	2	3	4	5
1. Stack Height (meters)	20.7				
2. Exhaust Temperature (Kelvin)	337				
3. Inner Stack Diameter (meters)	0.508				
4. Exit Velocity (m/second)	12.098				
5. Flow Rate (cubic m/sec)	2.452				
6. Latitude	18°16'-3"				
Longitude	67° 9'-10"				
UTM (easting)(km)	-				
UTM (northing) (km)	-				
B. Terrain Parameters					
1. Maximum Terrain Rise(meters)					
0 - 0.5 km radius	2.0				
0 - 2.5 km radius	12.0				
0 - 5.0 km radius	225				
2. Shortest distance to fence line	42				
C. Dimensions of Tallest Buildings*					
1. Distance from Stack (meters)	76				
2. Distance from nearest fence line (meters)	106				
3. Building height (meters)	19.8				
4. Building length (meters)	28				
5. Building width (meters)	15				

*Consider buildings within 5 building heights or 5 maximum projected widths of the stack.



WASTE INCINERATOR AIR FLOW SCHEMATIC SHOWING TEST LOCATION



US ENVIRONMENTAL PROTECTION AGENCY
TELECOMMUNICATIONS CENTER
WASHINGTON, DC 20460

FACSIMILE REQUEST AND COVER SHEET

PLEASE PRINT IN BLACK INK ONLY

TO

CLifford C.L. NG

OFFICE PHONE

USEPA / 264-9579

FAX # 8-264-7613

REGION/LAB

Region II

FROM

Lionel Vega

PHONE

FTS-475-8988

MAIL CODE

OS-343

OF

Office of Solid Waste/Assistance Branch

DATE

June 29, 1989

NUMBER OF PAGES TO INCLUDE COVER SHEET

5

Please number all pages

INFORMATION FOR SENDING FACSIMILE
MESSAGES TO EPA HEADQUARTERS

EQUIPMENT	FACSIMILE NUMBER NUMBER	VERIFICATION NUMBER
RAPICOM	(202) 382-7883 (auto)	(202) 382-2078
PANAFAX	(202) 382-7884 (auto)	(202) 382-2078
PANAFAX	(202) 382-7886 (auto)	(202) 382-2078
MANUAL	(202) 382-2078	

The EPA Communications Center has the capability for sending and receiving facsimile messages to CCITT Group I, II, and III Equipment.

EPA Form 5040-5 (Rev. 12-83) Replaces EPA Form 5040-5A and the previous edition of EPA Form 5040-5, which are obsolete.

6/28/89

Note to : Cliff Ng
Environmental Engineer
Region II

From : Lionel Vega
Chemical Engineer
Assistance Branch

Subject: Comments on Eli Lilly's Draft Permit

Attached are my comments and recommendations on the Eli Lilly draft permit for Lilly's liquid injection incinerator located in Puerto Rico.

We commend your efforts to address Metal and HCL emissions from the Eli Lilly Incinerator using the principles in the draft Guidance on Metals and Hydrogen Chloride Controls from Hazardous Waste Incinerator.

As you can note it is very difficult to write a clear *and simple* compliance schedule for this facility since various compliance options are available. We feel that wherever possible the conditions in a compliance schedule should be minimized to avoid confusion and disagreement when the compliance schedule is implemented. This can be accomplished by using data available at the time the permit is drafted and working out alternatives with the applicant upfront.

If you have any questions, please give me a call at FTS-475-8988.

Attachment

Comments on Part C and D: Limitations on Wastes and Operating Conditions

- o The maximum feed rate of the primary waste should be set in the permit. As you know this is required by regulation. Also, since the primary waste is the major source of chlorine and ash having a limit on the feed rate on this waste stream will assure that chlorine and ash feed rates will be continuously controlled.
- o You should consider setting a maximum pressure for the combustion chamber. As you know this is an issue for incinerators with more than one combustion chamber. However, it may be an issue for the Eli Lilly incinerator.
- o The maximum total ash feed rate should be set in the permit. This another reason why you should set the maximum feed rate of primary waste to the incinerator, since you already set ash concentration limits for this waste stream and feed rate and ash concentration limits for the secondary waste.

Comments on Part F of the Draft Permit: Controls of Metals and Hydrogen Chloride

General Comments:

- o Should not this part be under the compliance schedule section of the permit?

Specific Recommendations on Part F

- o A time limit of 30 days should be included in condition F.1 for the submission of the requested information.
- o I suggest that condition F.1 read as follows:
 - 1. The Permittee shall provide, within 30 calendar days of permit issuance, the following
 - (a) The information requested in Worksheet #1 of Attachment D to this permit requesting general reference information, site information, and desired maximum metal and chlorine feed rates.
 - (b) The information.....

Attachment (continuation)

c. I suggest that condition F.5. be re-order as follows;

5. EPA shall, based on the results of implementation of conditions VI. F.1 and VI. F.3..... make one of the followings determinations;

(a) Determine whether the Permittee shall conduct site-specific dispersion modelling....

(b) Determine the incinerator waste feed rate limits

(c) Determine whether the Permittee shall conduct a test burn to demonstrate that metal and hydrogen chloride emissions do not pose unacceptable health risks.

6. The permittee shall have the opportunity to demonstrate by site-specific dispersion modelling and data from conditions VI.F.1 and VI.F.3. or test emission data from condition VI.F.7 that feed rate limits or emission rate limits higher than those imposed by EPA will not result in an exceedance of ambient levels. If the permittee select this option, the Permittee shall.....

(a).....

(b)

7. If EPA, based on consideration of conditions (1) VI.F.1 and VI.F.3 or (1) in conjunction with site-specific dispersion modelling, determines that the Permittee shall conduct a test burn to demonstrate that metal and/or hydrogen chloride emissions will not pose unacceptable health risks the following shall be provided:

(a) Within 30 days of EPA's determination the Permittee shall submit a draft Test Burn Plan to the Director for approval

(b) Within 90 days of EPA's approval of the Test Burn Plan the Permittee shall submit test burn data to support setting higher metals limits

and/or chlorine
limits

Attachment (continuation)

8. EPA shall consider the results from implementing conditions (1) VI.F.1 and VI.F.3, or (2) VI.F.7., or (1) or (2) in conjunction with site-specific dispersion modelling, and current guidance on metals These permit.....
.....the following form:

- (a) Specify feed rate limits
- (b) Specify the actual.....
- (c) Specify the air pollution.....

Comments on Part D: Reporting

- also
- o It should be required on this part that the Permittee reports compliance or noncompliance with the interim and final requirements within 14 days following each milestone date, as required under 270.33 (a)(3).